



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

August 4, 2021

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Shi v. Mayorkas, et al.*, No. 21 Civ. 5428 (RA)

Dear Judge Abrams:

This Office represents the government in the above-referenced mandamus action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate her Application to Register Permanent Residence or Adjust Status (Form I-485). The government was served by mail on June 27, 2021, and thus its response to the complaint is due on August 30, 2021 under the Federal Rules of Civil Procedure. I write respectfully to request that the initial conference currently scheduled for August 16, 2021, be adjourned by approximately one month.

The adjournment is requested because USCIS has scheduled the plaintiff for an interview relating to the Form I-485 on August 13, 2021. Following the interview, USCIS anticipates that it will be in a better position to determine next steps, which may include taking adjudicative action that could render this case moot. Accordingly, the government is not currently requesting an extension of the August 30 date for its response to the complaint, but will assess whether such an extension is needed following the August 13 interview and may make an appropriate request at that time. The government respectfully submits that adjourning the initial conference by approximately thirty days (*i.e.*, to the week of September 20, 2021 or thereafter) is in the interests of efficiency.

This is the government’s first request for an adjournment of the initial conference in this case. The plaintiff consents to this request.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney

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SO ORDERED.

Hon. Ronnie Abrams
August 5, 2021